



MEMORANDUM

TO: Rick Crume, U.S. Environmental Protection Agency

FROM: Susan Radomski, Eastern Research Group

DATE: September 24, 1997

SUBJECT: Final Summary of September 22, 1997, Incinerator Work Group Teleconference

1.0 INTRODUCTION AND PURPOSE OF MEETING

The September 22 teleconference was the twelfth meeting of the Incinerator Work Group for the Industrial Combustion Coordinated Rulemaking (ICCR). The major goals of this meeting were to review the September Coordinating Committee meeting and discuss the ability of the subteams to meet the scheduled deadlines.

2.0 LOCATION AND DATE

This Work Group teleconference was held from 11:00 am until 12:00 pm on September 22, 1997. A copy of the draft meeting agenda is included as attachment 1.

3.0 ATTENDERS

The Incinerator Work Group meeting was open to the public. Participants at the meeting included representatives of the EPA, industry, and the environmental community. A copy of the attendance list for the meeting is included as attachment 2.

4.0 DISCUSSION

After introductions, the Work Group received a summary of the September Coordinating Committee Meeting, reviewed the fall schedule for the Work Group established at the September 3 Incinerator Work Group meeting, and discussed the ability of the subteams to meet the deadlines. The Work Group also heard updates on proper procedures for posting files to the

TTN and the progress of the Solid Waste Definition Subgroup. These topics are summarized in the sections that follow.

4.1 Review of Coordinating Committee Meeting

Norm Morrow of Exxon Chemical Americas provided a review of the Coordinating Committee meeting held September 16-17. He discussed the responses to the Information Collection Request, which included detailed information from 2700 facilities with 5000 combustion units. The information from these facilities should be available to the Work Groups in mid-October. He also mentioned that a third version of the current Inventory Database will be available in mid-December and will include new databases from the Department of Defense and the State of Louisiana.

The Coordinating Committee requested that the Work Groups review the Proposed Regulatory Development Schedule in the ICCR document which outlines the schedule developed for the ICCR process. The Work Groups are expected to present a schedule outlining their procedure for meeting applicable milestones at the November Coordinating Committee meeting. Rick Crume and Norm Morrow will compare the Proposed Regulatory Development Schedule with the schedule developed by the Incinerator Work Group and discuss any required changes at the October Work Group meeting.

The presentation given by the Incinerator Work Group was well received by the Coordinating Committee. The Committee had few comments and suggested that other work groups develop schedules similar to the format presented by the Incinerator Work Group.

4.2 Summary of Fall Schedule and Objectives

Rick Crume outlined the proposed schedule of Work Group activities and asked the subteams about their ability to meet the scheduled objectives. Subteams 1, 2, 3 and 5 responded that they expect to be ready for the next meeting. Subteam 4 did not have a member present and could not comment. A breakdown of the milestones to which the Work Group agreed is listed below:

October 14, 1997: Subteam provides draft subcategories
with corresponding descriptions.

November 18-19, 1997: Work Group presents subcategories to the Coordinating Committee.

March, 1998: Work Group identifies data gaps, develops test plans and model plants.

June, 1998: Work Group determines emission levels, MACT floors and control options.

July, 1998: Work Group completes a Draft Regulatory Alternatives Paper.

Following the summary, a Work Group member mentioned that one important step in preparing the subcategorization presentation for the Coordinating Committee is to identify the critical pollutants associated with the subcategory. Another member suggested the Work Group look at the lists of Section 129 and Section 112 pollutants and mark each one with a corresponding priority level. A suggestion was also made that any pollutants not considered to be critical be listed along with a reason for the exclusion.

The Work Group was reminded that the subteams will provide draft subcategories with corresponding descriptions by October 14. The presentation for the Coordinating Committee will be based on the revisions made to the Subcategorization Table at the October 28 Work Group meeting. The responsibilities of the subteams for the November presentation to the Coordinating Committee will be decided at the October 28 Work Group meeting. Subteam leaders may be needed to answer questions during the presentation. A Work Group member pointed out that the subteams will need to move very quickly once the presentation is complete to achieve the next milestone of identifying data gaps and developing emission test plans. The member requested that the subteams begin considering what emission testing may be helpful for their subcategories while preparing for the presentation.

4.3 Solid Waste Definition Subgroup

Jeff Shumaker of International Paper, a member of the Solid Waste Definition Subgroup, provided an update of the Subgroup activities. He reported that the Subgroup has begun forming the structure of a solid waste definition for the purposes of developing regulations. This structure will ultimately be filled in with the criteria of what constitutes a “fuel.” They hope to be able to define “fuel” and exclude materials which fall into this category. Also, materials considered to be “fuel-like” may be allowed material-specific exemptions and be excluded based on case-by-case analysis.

A Work Group member requested that the Subgroup not follow the EPA “Comparable Fuels” guidelines closely. She indicated that these guidelines exclude some materials that actually burn more cleanly than some fuels. A member of the Solid Waste Definition Subgroup requested that she send him some examples of materials for which this is true. The next Subgroup meeting will be held on October 14, 1997.

4.4 TTN Procedures Update

Tom Waddell of Eastern Research Group outlined the procedures for posting files to the TTN. He stated that, due to the large number of steps involved in posting files to the TTN, 3-4 working days are required from the time a file is received until it is visible on the TTN. He mentioned that alerts tend to apply to groupings of files that are posted simultaneously, and that an email will be sent to the Work Group about any files not included in an alert. Rick Crume also commented that an effort will be made in the future to post meeting minutes quickly.

5.0 ACTION ITEMS

The following action items are to be completed by the next Work Group meeting:

- Eastern Research Group will investigate the possibility of writing a query to find out what HAPs data are available from respondents to the Information Collection Request that would be of interest to the Work Group.
- Rick Crume and Norm Morrow will compare the Work Group schedule and the ICCR document milestone table and discuss any discrepancies between the two at the October Work Group meeting.

6.0 IMPORTANT DATES

The current Work Group meeting schedule and other important dates are as follows:

- October 9: Teleconference for Subteam leaders and interested Work Group members to discuss progress made in preparing for October 14 deadline, 11am-1pm EDT
- October 14: Recommended subcategories, subcategory definitions, rationale for subcategory selection, and applicable Clean Air Act section due to Rick Crume for each subteam.
- October 27: Tentative tour of GlaxoWellcome incinerators in Research Triangle Park, North Carolina, 3pm-5pm EST
- October 28: Work Group meeting in Research Triangle Park, North Carolina, 8:30am-3:30pm EST
- November 20: Work Group meeting scheduled for Houston, Texas (Note: the Coordinating Committee will meet on November 18 and 19)

These minutes represent an accurate description of matters discussed and conclusions reached and include a copy of all reports received, issued, or approved at the September 22, 1997, meeting of the Incinerator Work Group. Rick Crume, EPA Co-chair.

ATTACHMENTS

Attachment 1: Draft Meeting Agenda

Attachment 2: Meeting Attenders

ATTACHMENT 1

Draft Meeting Agenda

AGENDA

ICCR INCINERATOR WORKGROUP TELECONFERENCE

-- September 22, 1997, 11am to 1pm, EDT --

-- Call-in Number: 919-541-4332 --

- Welcome and Announcements -- Rick (5 min)
- Review of CC Meeting -- Norm (15 min)
- Summary of Fall Schedule and Objectives -- Rick (10 min)
- Subteam Leader Comments on Ability to Meet Schedule/Objectives --
Group (15 min)
- TTN Procedures Update -- Tom (10 min)
- Potential Glaxo Tour -- Doug (5 min)
- Wrap-up -- Norm and Rick (5 min)
- Adjourn -- Rick

ATTACHMENT 2

Meeting Attenders

Meeting Attenders

Name	Affiliation
Beth Berglund	Merck & Co, Inc.
Michael Brintnall	NASPAA
Richard Crume	U.S. EPA/OAQPS
Doug Finan	GlaxoWellcome
Jim Forsberg	NASPAA
Norman Morrow	Exxon Chemical Americas
Susan Radomski	Eastern Research Group, Inc.
Paul Rahill	Industrial Equipment and Engineering Company
Jeff Shumaker	International Paper
Dick Van Frank	National Audubon Society
Tom Waddell	Eastern Research Group
Dale Walter	Industrial Engineering and Equipment Company